UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

CRAIG WILSON, et al.,) CASE NO.: 4:20cv794
Petitioners,)) JUDGE JAMES S. GWIN)
V.)
MARK WILLIAMS, Warden of Elkton Federal Correctional Institution, et al.,) CORRECTED EMERGENCY) MOTION FOR STAY) PENDING APPEAL
Respondents.) <u>FENDING AFFEAL</u>))

Now come Respondents Mark Williams, Warden of Elkton Federal Correctional Institution and Michael Carvajal, Director of Federal Bureau of Prisons ("Respondents"), and, pursuant to Fed. R. Civ. P. 62(d), hereby respectfully move this Court to stay its Order and suspend the preliminary injunction contained therein issued on April 22, 2020 [ECF No. 22], pending final resolution of the appeal filed by Respondents on April 27, 2020. (Notice of Appeal, ECF No. 26 PageID # 394.) The grounds for this Motion are more fully set forth in the Memorandum in Support filed contemporaneously herewith.

(Signatures on the following page.)

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

By: /s/ James R. Bennett II

James R. Bennett II (OH #0071663) Sara DeCaro (OH #0072485) Assistant United States Attorneys United States Courthouse 801 West Superior Ave., Suite 400 Cleveland, Ohio 44113 216-622-3988 - Bennett 216-522-4982 - Fax James.Bennett4@usdoj.gov Sara.DeCaro@usdoj.gov

Attorneys for Respondents